



DICELLO LEVITT GUTZLER

ONE GRAND CENTRAL PLACE 60 E. 42ND STREET SUITE 2400 NEW YORK, NEW YORK 10165

F. FRANKLIN AMANAT
FAMANAT@DICELLOLEVITT.COM
646.933.1000 EXT 502
646.678.1737 (CELL)

November 29, 2021

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

**Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*
No. 1:13-cv-07789-LGS (S.D.N.Y.)**

Dear Judge Schofield:

We represent Forex Capital Markets, LLC, Lucid Markets LLP, FXDirectDealer, LLC, Virtu Financial LLC, Mapleridge Capital Corporation, LLC, TG Capital Fund LP, and Contrarian Capital Management, as well as other members of the certified settlement class in the above-referenced action. Each of these entities has filed claims against the class settlement fund under the Plan of Distribution in this matter.

On Wednesday, November 24, on the eve of the holiday weekend, Class Counsel filed a Notice of Motion for Entry of an Order Approving the Second Distribution of the Settlement Fund and Distribution of Attorneys' Fees (ECF No. 1627), accompanied by a memorandum of law and two declarations with exhibits. We write to respectfully advise the Court that our above-named clients oppose Class Counsel's motion on multiple grounds, and intend to submit a memorandum detailing the bases for their opposition. Moreover, based on our communications with numerous other claimants in this case, we understand that many more class members also oppose Class Counsel's motion and will either join our opposition to the motion or file their own oppositions in short order.

Consistent with S.D.N.Y. L.R. 6.1(b), we respectfully ask that the Court give class members fourteen days from the date that Class Counsel filed their motion—through December 8, 2021—to submit papers in opposition to the motion. In addition to preparing our

clients' opposition to the motion, we intend to use that interval to meet and confer with Class Counsel in an attempt to resolve or at least narrow some of our serious concerns; this schedule will also allow us to continue to engage with other class members to ascertain others who may wish to join or support our opposition to the motion, and to coordinate with those who may plan to file their own oppositions.

We appreciate the Court's time and attention to this matter.

Respectfully submitted,

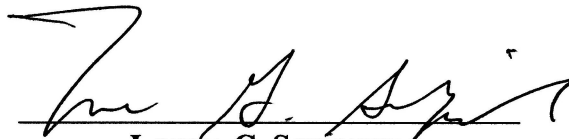


F. Franklin Amanat
DiCELLO LEVITT GUTZLER LLC

cc: Class Counsel (by ECF and email)
All Counsel of Record (by ECF)

The November 29, 2021, Order approving the Second Distribution of the Settlement Fund and Distribution of Attorneys' Fees is STAYED. Any objection to the Second Disbursement of the Settlement Fund shall be filed by **December 1, 2021**.

Dated: November 30, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE